

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

JENNIFER A. CONNORS,

PLAINTIFF

**V.**

DARTMOUTH HITCHCOCK MEDICAL CENTER  
DARTMOUTH MEDICAL SCHOOL,  
MARY HITCHCOCK MEMORIAL HOSPITAL  
DARTMOUTH-HITCHCOCK CLINIC and  
TRUSTEES OF DARTMOUTH COLLEGE

Case No.: 2:10-cv-94

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**  
**OF PLAINTIFF'S DISABILITY DISCRIMINATION AND RETALIATION CLAIMS**

NOW COME the Defendants, Dartmouth Hitchcock Medical Center, Dartmouth Medical School, Mary Hitchcock Memorial Hospital, Dartmouth-Hitchcock Clinic and Trustees of Dartmouth College and hereby move for summary judgment of Counts One and Two of Plaintiff's Complaint pursuant to Federal Rule of Civil Procedure 56.

1. The grounds for this Motion are further set forth with particularity in Defendants' supporting Memorandum of Law, filed herewith and incorporated herein.

2. Because this is a dispositive motion, the concurrence of the plaintiff in the relief requested was not sought.

WHEREFORE, Defendants, Dartmouth Hitchcock Medical Center, Dartmouth Medical School, Mary Hitchcock Memorial Hospital, Dartmouth-Hitchcock Clinic and Trustees of Dartmouth College request that the Court:

- A. Dismiss Counts One and Two of Plaintiff's Complaint; and
- B. Grant such other and further relief as the Court deems just.

Respectfully submitted,

DARTMOUTH HITCHCOCK MEDICAL  
CENTER  
DARTMOUTH MEDICAL SCHOOL  
MARY HITCHCOCK MEMORIAL  
HOSPITAL  
DARTMOUTH-HITCHCOCK CLINIC and  
TRUSTEES OF DARTMOUTH COLLEGE

Dated: April 15, 2011

By /s/ William D. Pandolph  
William D. Pandolph  
Edward M. Kaplan (Pro Hac Vice)  
Sulloway & Hollis, P.L.L.C.  
9 Capitol Street  
Concord, NH 03301  
603/223-2862

CERTIFICATE OF SERVICE

Served electronically:

Norman E. Watts, Esquire  
Watts Law Firm, PC  
PO Box 270  
Woodstock, Vermont 05091.

Dated: April 15, 2011

By /s/ William D. Pandolph  
William D. Pandolph